

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

FILED

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INDIANA UTILITY  
REGULATORY COMMISSION

IN THE MATTER OF THE PETITION OF )  
INDIANA BELL TELEPHONE COMPANY, )  
INCORPORATED, D/B/A AMERITECH )  
INDIANA PURSUANT TO I.C. 8-1-2-61 ) CAUSE NO. 41657  
FOR A THREE-PHASE PROCESS FOR )  
COMMISSION REVIEW OF VARIOUS )  
SUBMISSIONS OF AMERITECH INDIANA )  
TO SHOW COMPLIANCE WITH SECTION )  
271(C) OF THE TELECOMMUNICATIONS )  
ACT OF 1996 )

**Z-TEL COMMUNICATIONS, INC.'S**  
**PETITION TO INTERVENE**

Z-TEL Communications, Inc. ("Z-TEL"), by counsel, moves the Indiana Utility Regulatory Commission (the "Commission") pursuant to 170 IAC 1-1-9 for leave to intervene and be deemed a party in the above captioned proceeding. In support of this Petition, Z-TEL cites the following:

1. Z-TEL is a Delaware corporation with offices at 601 S. Harbour Island Blvd., Ste. 220, Tampa, Florida 33602, and is authorized to conduct business in the State of Indiana. Z-TEL is a provider of facilities-based local exchange telecommunications services and Caller ID.

2. Z-TEL is authorized to provide facilities-based local exchange telecommunications services and Caller ID throughout the State of Indiana. See In Re Z-TEL, IURC Cause No. 41732 (Approved July 19, 2000).<sup>1</sup>

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<sup>1</sup> On July 12, 1999, Rhythms Links, Inc. was substituted in place of ACI as the certificated entity.

3. Z-TEL has a substantial interest in this proceeding, particularly as it affects its status as a purchaser of Ameritech Indiana's wholesale products and as a competitor of its retail products. Specifically, given the Commission's August 29, 2000 Order in this Cause, Z-TEL has an interest addressed in the Interim Report and their resolution going forward.

4. Z-TEL is represented by the following counsel in this proceeding who are authorized to accept service of all papers and pleadings on its behalf and should be served with all matters of record:

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5. The granting of party status to Z-TEL will not unduly broaden the issues considered in this proceeding.

6. Z-TEL agrees to be bound by all stipulations, rulings and other matters of record prior to the time its Petition to Intervene is granted by the Commission.

*WHEREFORE*, Z-TEL Communications, Inc. respectfully petitions the Commission to grant its intervention and accord it party status in this proceeding and for all other just and proper relief.

Respectfully submitted,

**Z-TEL COMMUNICATIONS, INC.**

A handwritten signature in black ink, appearing to read 'Robert K. Johnson', written over a horizontal line.

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Counsel for Z-TEL Communications, Inc.

**CERTIFICATE OF SERVICE**

The undersigned certifies that on this 1st day of September, 2000, a copy of the foregoing *Z-TEL Communications, Inc.'s Petition to Intervene* was served by U.S. First Class mail to the offices of:

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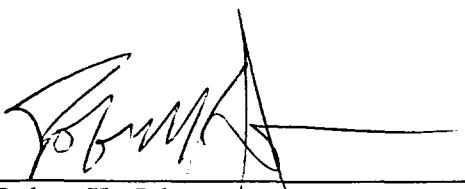
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